WISCONSIN DEPARTMENT OF NATURAL RESOURCES
SOUTH EAST REGION
MILWAUKEE SERVICE CENTER

AIR COMPLIANCE INSPECTION OF

FID # 241063570

INSPECTION PERFORMED BY
Ashok K. Singh

DATE OF INSPECTION

February 14, 2011

REPORT NOTED BY

Sd// Daniel Schramm

Daniel Schramm

DATE NOTED
05/19/2011

DEPARTMENT OF NATURAL RESOURCES
MILWAUKEE SERVICE CENTER – SOUTHEAST REGION
FULL AIR COMPLIANCE EVALUATION (FCE) SUMMARY

FID: 241063570	**FCE/SITE VISIT DATE:** February 14, 2011 ■ EPA COMMITTED FCE ☐ UNCOMMITTED FCE
FACILITY NAME AND LOCATION: Kitzinger Cooperage Corporation 2529 East Norwich Ave. St. Francis, WI.-53235	**EPA CLASS TYPE:** ■ MAJOR (A) ☐ SYNTHETIC MINOR PTE>80% (SM80) ☐ SYNTHETIC MINOR PTE <80% (SM) ☐ MINOR (B)
COUNTY: Milwaukee County	**SIC CODE(S)/DESCRIPTION:** 33243 Metal can, Box, and other Metal Container manufacturing.
INSPECTION PARTICIPANTS: Ashok Singh – WDNR Mark Furgason – President, Kitzinger Cooperage Corp. Amy J. Litscher – President, Saga Environmental & Engineering, Inc.	**APPLICABLE AIR PROGRAMS:** ■ SIP ☐ NSPS ■ NESHAP/MACT ☐ NR445 ☐ PSD

TOTAL ACTUAL FACILITY EMISSIONS IN TONS/YEAR:

	TSP	SO_2	NO_X	VOC	CO	PM10	HAP
2008	6.51	BLR	BLR	20.90	BLR	Not reported	Methylene Chloride = 6.55 Triethylamine = 3.11
2009	BLR	BLR	BLR	15.5	BLR	Not reported	Methylene Chloride = 5.10 Triethylamine = 2.20
CLASS	B	B	B	A	B	B	A
ATTAIN?	Att.	Att.	Att.	Non-Att.	Att.	Att.	

(Data above is from the 2008 and 2009 emission inventories.)

IS FACILITY IN COMPLIANCE WITH ALL WISCONSIN AIR REGULATIONS? YES

A. K. Singh — 5/17/11

INSPECTOR SIGNATURE: — **SIGNATURE DATE:**
TITLE:

Cc: Bureau of Air Management – Compliance, AM/7
US Environmental Protection Agency – Region V

FACILITY INFORMATION

FACILITY CONTACT:	FACILITY CONTACT PHONE/EMAIL:
Mark Furgason – President, Kitzinger Cooperage Corp	**(414) 483 – 8800 // mfurgason@kitzingercooperage.com**

FACILITY DESCRIPTION:

Kitzinger Cooperage Corporation reconditions used (empty) containers, including pails, drums, and totes. Totes are large liquid storage containers. The pails and drums processed can range in size from 5 to 55 gallons. Containers can be either plastic or metal, depending upon their original use and the materials formerly stored (mostly industrial solvents, resins, and coatings).

At the facility, the containers are inspected, cleaned, refurbished, leak-tested, painted, and resold. Damaged containers are crushed or chipped and sent off for recycle. The facility also operates a small 30-gallon steel drum (pail) manufacturing line.

The facility is located in the City of St. Francis, Milwaukee County. The surrounding area is commercial and residential. Milwaukee County is designated a moderate ozone nonattainment area. The facility has two locations, the Norwich Avenue Site and the Pennsylvania Avenue Site. The two locations are separated by public street (Norwich Avenue).

Norwich Avenue Site was refurbishing (reconditioning) used, steel drum before there was an air program (1969). In the mid-1990s, the company purchased a nearby building, located on corner of Norwich Avenue and Pennsylvania Avenue, and a drum reclamation business located in West Allis, National Container Recycling. In 1995, Kitzinger relocated the operations from the National Container Recycling to the newly purchased building. The new building is known as the Pennsylvania Avenue Site. Because of their close proximity, common ownership, and similar operations, the two sites are considered the same facility.

The Norwich Avenue Site specializes in the processing of metal containers, including drums that require the application of a protective internal coating and the production of unlined, 30-gallon steel containers. Plastic containers (pails and drums) and totes are almost exclusively processed at Pennsylvania Avenue site. Unlined metal drums, or those storing clean organic liquids and solvents, can be reconditioned at both Norwich Avenue Site and the Pennsylvania Avenue Site. The facility's drum reclamation furnace is associated with the Norwich Avenue Site. The furnace is located outside and behind the main production building on Norwich Avenue. The furnace processes drums requiring incineration. Only metal drums are incinerated.

Operations at Pennsylvania Avenue Site include the tote caustic flush line (Process P90), automatic caustic flush line (Process P42), caustic preflush line (Process P80), label stripping operation (Process P44), solvent drum cleaning operation (Process P45) and drum painting line (Process P43).

The particulate matter emissions from the paint spray booths are controlled using fabric filters. The particulate matter emissions from the shotblast units are controlled using baghouses. The organic and particulate matter emissions from the reclamation furnace are controlled using an afterburner. A wet scrubber controls the caustic emissions from the caustic flushing operations at the Pennsylvania Avenue Site.

POINT/PROCESS DESCRIPTION:

A. Description of existing units located at Norwich Ave. plant:

1. Process B20, Stack S08 (Process heat boiler):

Stack S08, Process B20 - Cleaver Brooks 100 HP Boiler: The boiler, installed in 1969, is natural gas-fired with a rated heat input capacity of 5.2 mmBtu/hr. The boiler was damaged, but not destroyed, by the fire in 2005. Its electrical control panel was rebuilt. The boiler continues to exhaust from a fixed exhaust stack (Stack S08). The unit's air emissions are not controlled. The boiler's usage of natural gas burned is not metered. For inventory reporting purposes, the boiler's use of natural gas is estimated to be 10% of the facility's total usage. This boiler was in operation during this inspection. Emissions are vented outside through a stack.

2. Process P30, Stack S10, Control C10 (Reclamation furnace):

Drum Reclamation Furnace with Afterburner: The unit, installed in June of 1976, consists of a conveyor belt, combustion chamber, and afterburner. The combustion chamber and afterburner are both natural gas-fired. The combined the fuel burning capacity is 16.0 mmBtu/hr. The unit's usage of natural gas is not metered. Open top metal drums are first drained of any residual solvents or oils, turned upside down and put on a conveyor that takes them to the reclamation furnace. They proceed through the reclamation furnace to remove any residual materials in the drum as well as burning the drum's interior and exterior coatings to ash. The reclamation furnace has twelve natural gas fired burners of 1.0 mmBtu/hr each and operates at a temperature of approximately 1,600 °F. The furnace has the capacity to process 300 drums per hour. Air emissions from the furnace are vented through a 1,800 – 2,000 °F afterburner, and then go through over 30 feet of horizontal duct work before being released to the atmosphere through a vertical exhaust stack. The afterburner has four natural gas fired burners of 1.0 mmBtu/hr each. For reporting purposes, its use of natural gas is estimated to be 70% of the facility's total usage. The exhaust stack to the furnace/afterburner was recently raised. The afterburner is estimated to control particulate matter emissions by 75% and VOC emissions by at least 85%. This process was in operation during this inspection.

3. Process P31, Stack S11, Control C11 (Two shot blasters):

The facility has three shotblasting units. One unit vents inside the building and two units vent outside. Process P31 is associated with two units which vent outside the building. The shotblaster units are used to remove ash and char from open top metal drums prior to spray painting. The shotblaster (2 units combined) processes a maximum of 300 drums per hour. Emissions from the shotblaster units are vented directly to a single baghouse (C11) which exhaust outside. The bags of the baghouse are cleaned by shaking each time the shotblaster units are shutdown for greater than one hour. At the end of each day the baghouse is cleaned and the dust collection hopper is emptied. The collected material is landfilled. After shotblasting, the steel drums are conveyed to the leak check and dent removal line. Normal operational hour of the units are 5-8 hours on any given day. Only one shot blaster was in operation during this inspection.

4. Process P32, Stack S12, Control C32 (Internal Drum Paint Spray Booth), Process P32A, Stack S12A, Control C32A (Internal Lid Lining Paint Spray Booth), Process P32B, Stack S12B (Curing oven associated P32 and P32A), Process P32C, Stack S12C, Control 32C (Auto External Paint Spray Booth), Process P35, Stack S13, Control C35 (Manual External Spray Booth), Process P32D, Stack S55 (Curing oven associated with P32C and P35), and Process 36A, Stack S14, Control C14 (New Drum Lid Spray Booth), Process P36B, Stack S56 (Curing Oven associated with P36A):

The paint line, installed in 2005, replaces the line (processes previously identified as P32, P33, and P34) destroyed by the fire in 2005. The coatings applied are water based. Fabric overspray filters (C32, C32A, C32C) control particulate matter emissions from the spray booths. As per manufacturer paint arrestor test summary, the fabric filter's particulate matter control efficiency ranges between 99.2% and 99.67% at pressure drops ranging between 0.035 and 0.5 inches of water. Process P32 has 8 rotary air assist spray guns, process P32A has 3 air assist guns, process 32C has 12 air assist guns (only 11 is used), process P35 has 10 air assist guns and process P36A has 3 air assist guns. Painted lids and drums are oven dried in processes P32B, P32D, and P36A at 200° F. Emissions from five paint booths and three curing ovens are vented outside through individual stacks. All these processes were in operation during this inspection

5 Processes P50A, Stack S50 (Caustic Drum Pre-flush), Process P50B, Stack S51 (Caustic Wash), and Process P50C, StackS53 (Drying oven, 0.6 mmBTU/hr):

Closed top steel drums are cleaned here before painting. The process consists of caustic pre-flush, hot caustic wash holding tank and a natural gas fired dryer. 5-6% (by weight) NaOH solution is used to wash the drums. After the drums are dried they are conveyed on a conveyor to the manual external spray booth (P35). The paint is then dried in drying oven (P32D) and is shipped out or stored in storage area (trucks). NaOH emissions are vented to the atmosphere uncontrolled. This process was in operation during this inspection.

6. Process 60A, Stack S57 (New Drum/Lid Caustic Washer Hot Bath), Process P60B, Stack S58 (New Drum/Lid Dryer, 1 mmBTU/hr):

New manufactured drum and lids are cleaned here before painting the drums. Drums are cleaned in a hot caustic bath. The bath has its own natural gas fired burner (0.5 mmBTU/hr) to heat the caustic solution. After wash the drum/lids are dried in a natural gas fired

dryer (P60B) and are conveyed to spray booth P36A for painting. Painted drums are dried in a dryer (P36B). Finished drums are shipped to storage area (trucks). NaOH emission from this process is vented to atmosphere uncontrolled. This process was not in operation during this inspection.

7. Process S65, Stack S65 (Drum Lid Dip Tank):

Seal rings, which are used to attach the lids to the open-top drums, are stacked on a hook and then dipped into a 75 gallon bath. The gray-colored coating in the bath is reportedly a water-base paint, thinned in a ratio of 3 parts paint to 4 parts water. As the coating volume in the bath decreases, additional coating is added to the bath, using the same mix ratio. VOC emission from this process is fugitive. This process was in operation during this inspection.

B. Description of processes at Pennsylvania plant:

1. **Process P44, Stack S44 (Plastic Drum Label Stripper), Process P45, Stack S45 (Plastic Drum Wipe Cleaning):**

Labels are removed from the exterior of plastic drums using a brush-on stripping compound which contains methylene chloride. Two semi paste solvents are used. Zep Big Orange solvent has a VOC content of 6.59 lbs/gallon and contains methylene chloride. Chemispehere SP 1700 has a VOC content of 1.52 lbs/gallon. Emissions from this process are fugitive.

2. Process P95, Stack S21, Control C21 (Small Plastic Drum Caustic Pre-Flush):

Small plastic drums are dipped into a caustic solution to soften paint. Sodium hydroxide is the active ingredient in this solution. The maximum capacity of this process for handling drums is 100 per hour. Air emissions are controlled by a wet scrubber (Process C21) which vents outside.

3. Process P80A, Stacks S60, S21 (Caustic Preflush with Hot Caustic Heater), Process P80B, Stacks S61, S21 (Exterior Caustic Wash with Hot caustic heater), Process P80C, Stack S21Control C21 (Exterior Rinse with Water):

The drums are washed in a caustic solution. The drums are transported to and from these processes via conveyor. These processes (P80A, P80B, and P80C) were constructed in July 1995. Emissions from burning natural gas in the heater associated with P80A are exhausted via stack S60. Emissions from burning natural gas in the heater associated with P80B are exhausted via stack S61. Caustic (NaOH) emissions from these processes are controlled by a wet scrubber (C21) before exhausting via stack S21.

The closed top drums (plastic) are washed upside down. Process P80A (caustic preflush of drum interior) is actuated as each drum passes over the wash solution injection pipe. The exterior caustic drum wash operation (P80B) sprays wash solution from the top of the wash system enclosure over the top of the drums. The exterior drum spray system (P80B) is turned on at the beginning of the shift, and wash solution is sprayed continuously throughout the shift (i.e. for eight hours). A 1 to 2% (by wt.) NaOH solution is used in processes P80A and P80B. This process was in operation during this visit.

4. Process P42, Stack S21 (Internal Drum Washer), Control C21, Process P42A, Stack S64 (Hot Water Heater), Process P42B, Stack S63 (Hot Water Heater), Process P42C, Stack S62 (Hot Water Heater):

The internal drum washer (P42) consists of several dip tank stations. In the past, this process had used NaOH solution to clean the drums. Now only hot water is used to flushed/rinsed/clean the interior of the drum. This process is no more a source of air pollution. Emissions from the natural gas fired heaters (P42A, P42B, and P42C) are vented through stacks S62, S63, and S64, respectively. Emissions from P42 exhaust through stack S21, via wet scrubber (C21). This process was in operation during this inspection.

5. Process P43A, Stack S22, Control C22 (Auto Drum/Lid Spray Booth), Process P43B, Stack S70 (Auto Drum/Lid Drying Oven):

Drums are painted in this paint booth using only one airless spray gun. As the facility do not clean steel drum at Pennsylvania Ave. plant any more, this booth is used very rarely. Particulate matter is controlled by a fabric filter. Painted drums are dried in a natural gas fired 2.4 mmBTU/hr rated oven. This process was not in operation during this inspection.

6. Process P90, Stack S21, Control C21 (Tote Caustic Wash), Process P90A, Stack S67 (Hot caustic Heater), P90B, Stack S68 (Hot Caustic Heater), Process P90C, Stack S69 (Hot Caustic Heater):

In Process P90, the interior of the tote is washed with a caustic solution to soften the paint. The exterior of the tote is manually sprayed with water using a pressure washer as the tote exits the wash system. The internal flush system portion of P90 is actuated as each tote passes over the wash solution injection pipe. P90A and P90B are heaters that heat caustic solution to a desired temperature. P90C is a heater that heats water. The emissions from the operation, excluding combustion products, exhaust through Stack S21 after going through a wet scrubber (C21). Combustion products from the natural gas fired heaters P90A, P90B, and P90C are exhausted through stacks S67, S68, and S69, respectively. Stacks S67, S68, and S69 have no rainhats.

PERMIT(S) ISSUED:

PERMIT NO.	ISSUE DATE	PURPOSE OF PERMIT	RENEWAL APPL DUE DATE (IF APPLICABLE)
241063570-P10	November 30, 2010	Renewal of operation permit	May 31, 2015

COMPLIANCE OUTLINE

SOURCE	POLLUTANT	LIMITATION	COMPLIANCE DEMONSTRATION	COMPLIANCE STATUS
Process B20, Stack S08 — Cleaver Brooks 100-HP Boiler. [located at Norwich Avenue site]	**Particulate matter emissions**	**(1)** Particulate matter emissions may not exceed 0.04 pounds per hour from stack S08. **[s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]** **(2)** For any boiler which has a maximum heat input that is greater than one million Btu per hour, the permittee may not cause, allow, or permit particulate matter emissions from the stack of such a boiler to exceed E pounds of particulate matter emissions per million Btu heat input, where E = 0.3 - 0.0006 I and I = total maximum heat input for a given boiler in millions of Btu per hour. **[s. NR 415.06(1)(c)1., Wis. Adm. Code {Permit 08-RSG-053}]** **(3)** *The permittee shall keep monthly records of the types of all fuels burned in the boiler. [s. NR 439.04(1)(d), Wis. Adm. Code {Permit 08-RSG-053}]*	**(1)** The permittee shall only fire natural gas in the boiler.[ss. 285.65(7) Stats., and NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1), (2) and (3) In compliance –** The facility burns only natural gas and buys the gas from Constellation Energy, Chicago, Ill. The facility has only one meter for the whole facility and monthly records are maintained based on the supplier invoices.

	Visible emissions	**(1)** Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.04(2),Wis. Adm. Code {Permit 08-RSG-053}] **(2)** Notwithstanding condition (1) above, when the boiler is being cleaned or a new fire started, emissions may exceed number 1 of the Ringlemann chart or 20% opacity but may not exceed number 4 of the Ringlemann chart or 80 % opacity for 6 minutes in any one hour. Combustion equipment may not be cleaned nor a fire started more than 3 times per day (see note). [ss. NR 431.04(2) and NR 431.05(1), Wis. Adm. Code {Permit 08-RSG-053}] Note: "Combustion equipment may not be cleaned nor a fire started more than 3 times per day" means the above exemption is available only up to 3 cleanings or fires started per day. **(3)** Notwithstanding condition (1) above, emissions may exceed number 1 of the Ringlemann chart or 20% opacity for stated periods of time, as permitted by the department, for such purpose as an operating test, or other good cause, provided no hazard or unsafe conditions arises. [ss. NR 431.04(2) and NR 431.05(2), Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** The compliance demonstration requirement for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions.[s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1), (2), and (3) In compliance –** This boiler was in operation during this visit. No VE was noted. Boiler is started once every day at the start of the shift. The boiler is rated at 5.2 mmBTU/hr.
	NO_x emissions	**(1)** The boiler may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	**(1)** Permittee shall compile weekly records to demonstrate that the boiler did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance –** Daily working hours are maintained. The boiler working hours ranges between 6 to 9 hours on any given day. As the facility operates only Monday to Friday, the boiler maximum operational hours will be 45 hours.
Process P30, Control Device C10 (afterburner),	**Particulate matter emissions**	**(1)** Particulate matter emissions may not exceed 5.0 pounds per hour from stack S10. **[s. NR 404.08(2), Wis.**	**(1)** Only natural gas shall be used as combustion fuel. [s. 285.65(3), Wis. Stats., s. NR	**(1) In compliance –** Only natural gas is used to fuel reclamation furnace and afterburner.

Stack S10 — Reclamation Furnace. [located at Norwich Avenue site]		**Adm. Code {Permit 08-RSG-053}]**	407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}] **(2)** The afterburner shall be operated at all times the reclamation furnace is in operation. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}] **(3)** The operating temperature of the afterburner shall be at least 1800 °F, unless the Department approves, in writing, a different minimum temperature. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}] **(4)** *The permittee shall keep monthly records of type(s) of fuel used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1.,Wis. Adm. Code {08-RSG-053}]* **(5)** *The permittee shall install, operate, calibrate, and maintain the monitor(s) necessary to measure the afterburner temperature. [ss. NR 439.055(1),(4), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]* **(6)** *The temperature monitoring device shall have an accuracy of 0.5% of the temperature being measured in degrees Fahrenheit or ± 5 °F of the temperature being measured, or the equivalent in degrees Celsius (centigrade), whichever is greater. [ss. NR 439.055(3)(a), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]* **(7)** *The afterburner temperature shall be*	**(2) No evidence of noncompliance.** **(3) In compliance –** Strip charts were reviewed. Chart indicated that the afterburner is run at or above1800 °F. At the time of this inspection the afterburner temperature was 1840°F. **(4)** The facility burns only natural gas and buys the gas from Constellation Energy, Chicago, Ill. The facility has only one meter for the whole facility and monthly records are maintained based on the supplier invoices. **(5) No evidence of noncompliance.** The boiler has an instantaneous readout meter and strip chart to record temperature to record after burner temperature. Maintenance is done as and when needed by the maintenance staff of the facility. **(6) and (7) In compliance –** The afterburner has a digital readout meter to read the instantaneous temperature and also record the temperature continuously on a strip chart.

			monitored and recorded at least once every 15 minutes. [ss. NR 439.055(2)(a), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	
	Visible emissions	**(1)** Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}]	**(1) In compliance –** The afterburner was in operation during this visit. No VE was noted from Stack S10.
	VOC emissions	**(1)** 85% control of VOC. [s. NR 424.03(2), Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for volatile organic compounds. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}]	**(1) In compliance –** Please see compliance status under Particulate matter emission.
	NO_x emissions	**(1)** The process P30 may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	**(1)** Permittee shall compile weekly records to demonstrate that the process P30 did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance –** Review of daily records indicate that afterburner and reclamation furnace operates 5 to 8 hours on any given day. As the facility operates only Monday to Friday, The boiler maximum operational hours will be 40 hours.
Process P31, Control Device C11 (Baghouse), Stack S11 — Shot Blasting (2 emission units). {[located at Norwich Avenue site] }	**Particulate matter emissions**	**(1)** Particulate matter emissions may not exceed 1.0 pounds per hour from stack S11. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] **(2)** The process P31 may not operate for more than 80 hours during any week. [s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	**(1)** The permittee shall use a baghouse to control particulate matter emissions from the process P31. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}] **(2)** The permittee shall install, operate, and maintain a device to monitor the pressure drop across the baghouse. [ss. NR 439.055(1)(a), and	**(1) In compliance –** The facility has three shot blasters. One vents inside the building and two are controlled by a single bag house which vents to the atmosphere. **(2), and (4) In compliance** – The facility runs only one shift. Pressure drop is recorded once per shift if the shot blasters are in operation. Review of record indicates that baghouse

			NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] **(3)** The permittee shall perform an internal inspection of the baghouse once every calendar year to ensure that the control equipment is operating properly. The time interval between inspections may not be closer than 6 months. These inspections shall include, but not be limited to inspections and maintenance/ repair (as necessary) of: (a) valves, hatches, dampers, and gaskets for signs of air infiltration; and (b) bag condition, tension, and signs of clean side dust deposits. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}] **(4)** *The permittee shall monitor and record the pressure drop across the baghouse every 8 hours of source (P31) operation, or once per day, whichever yields the greater number of measurements. [ss. NR 439.055(2)(b)1., and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]* **(5)** *The permittee shall keep records of all inspections, checks and any maintenance (including bag replacement) or repair performed on the baghouse. The records shall include the date of the action and a description of any corrective actions taken. [ss. NR 439.04(1)(d), and*	pressure drop ranges between 6" to 7"of water. **(3), (5), and (6) In compliance –** Last annual inspection was conducted on 7/29/2010. Maintenance was done on 2/25/2010, 4/17/2010, 7/17/2010, and 8/21/2010. Records were available for review. Daily record of operating hours is maintained. This process runs between 5 to 8 hours on any given day.

			NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] **(6)** *The permittee shall keep weekly records of operating hours of P31. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]*	
	Visible emissions	**(1)** Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}]	**(1) No evidence of noncompliance** – Only one shot blaster was in operation during this inspection. No VE was observed from S11.
Process P32, Control Device C32 (Fabric filter), Stack S12 — Internal Drum Spray Booth. Process P32A, Control Device C32A (Fabric Filter), Stack S12A — Internal Lid Lining Spray Booth. Process P32B, Stack S12B — Curing Oven. Process P32C, Control Device C32C (Fabric Filter), Stack S12C — Auto External Drum Spray Booth. Process P35, Control Device C35 (Fabric filter), Stack S13 — Manual External Spray Booth. Process P32D, Stack S55 — Curing Oven. Process P36A,	**Particulate matter emissions** **Particulate matter emissions contd.**	**(1)** Particulate matter emissions may not exceed the following: (a) 0.13 pounds per hour from stack S12. (b) 0.05 pounds per hour from stack S12A. (c) 0.02 pounds per hour from stack S12B. (d) 0.145 pounds per hour from stack S12C. (e) 0.19 pounds per hour from stack S13. (f) 0.01 pounds per hour from stack S55. (g) 0.14 pounds per hour from stack S14. (h) 0.01 pounds per hour from stack S56. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	**(1)**(a) For each of the spray booths, dry filter(s) shall be in place to control particulate matter emissions whenever the process is in operation (i.e. during spray operation). (b) The dry filters used in process P32C shall have a particulate matter control efficiency of at least 99%. (c) The dry filters used in processes P32, P32A, P35, and P36A shall have a particulate matter control efficiency of at least 98%. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(2)** Only natural gas shall be combusted in the curing ovens (P32B, P32D, and P36B). [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(3)** The permittee shall install, operate, and maintain a device to	**(1)(a),(b), and (c) – In compliance** – Dry paper filter is used to control particulate matter emissions. The filters are replaced at the beginning of the coating operation. As per manufacturer's standard product evaluation test, the average control efficiency of the filter ranges between 99.2% to 99.67% for the corresponding pressure drop of 0.035 inches of water and 0.5 inches of water. This control efficiency is greater than 99% and 98% as required in permit condition number (1)(b) and (1)(c). **(2) In compliance** – Only natural gas is used in the curing oven. There is no back-up fuel. **(3), (4)(a), (4)(b), and (4)(c) – In compliance** – Pressure drop gauges are installed to

Control Device C14 (Fabric filter), Stack S14 — New Drum Lid Spray Booth. Process P36B, Stack S56 — Curing Oven. [these processes are located at Norwich Avenue site]			monitor the pressure drop across each filter. [ss. NR 439.055(1)(a), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] **(4)**(a) The pressure drop across each filter in operation shall be maintained within the range recommended by the manufacturer. (b) The permittee shall keep records (e.g. manufacturer's specifications) that indicate the manufacturer recommended pressure drop range for type of filter used in each paint booth. (c) The operating filter pressure drop range for each paint booth shall be included in the facility's malfunction prevention and abatement plan. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] **(5)** The permittee shall perform daily inspections of the filters (on days of operation) to ensure that the control equipment is operating properly.[s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] **(6)** *The permittee shall monitor and record the pressure drop across the filter(s) every 8 hours when the associated process is in operation. [ss. NR 439.055(2)(b)1., and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]* **(7)** *The permittee shall keep daily records of filter inspections. The permittee shall also keep*	monitor the pressure drop across the filter. Manufacturer suggested pressure drop ranges between 0.08 inches of water to 0.5 inches of water. The same has been incorporated in the facility's malfunction prevention and abatement plan. The plan was last updated on December 29, 2010. The facility records pressure drop across the filters every 8 hours of operation. As per record maintained by the facility, the pressure drop across the filters ranges between 0.03 inches of water and 0.18 inches of water. **(5) In compliance-** As per Mark Furgason, at the beginning of the shift the paper filters are visually inspected before the start of the shift and the filters are replaced on a daily basis before the start of painting operation. **(6) In compliance -** The facility records pressure drop across the filters every 8 hours of operation. The pressure drop across the filters ranges between 0.03 inches of water and 0.18 inches of water. Records were available for review. **(7) No evidence of noncompliance-** Filters are replaced on a daily basis before the start of the

			records of filter replacements including date(s) of replacement for each paint booth process. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] **(8)***(a) The permittee shall maintain records that indicate the particulate matter control efficiency of the filters used in P32C.* *(b) The permittee shall maintain records that indicate the particulate matter control efficiency of the filters used in P32, P32A, P35, and P36A.*	coating operation. However, no records of inspection or replacement of filters are maintained at site. **(8)(a), and (8)(b) – In compliance** – Same kind of filters are used on all five booths. As per manufacturer's standard product evaluation test, the average control efficiency of the filter ranges between 99.2% to 99.67% for the corresponding pressure drop of 0.035 inches of water and 0.5 inches of water. This control efficiency is greater than 99% and 98% as required in permit condition number (1)(b) and (1)(c).
	Visible emissions	**(1)** Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance** – Please read compliance status under particulate matter emission above.
	VOC emissions	**(1)** The permittee may not cause, allow, or permit the emission of any VOCs in excess of 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator that applies air-dried coatings that are not clear coatings. [s. NR 422.15(3)©, Wis. Adm. Code {Permit 08-RSG-053}] (2) Emissions may not exceed 3.5 pounds VOC per gallon of coating applied, excluding water, for extreme performance cured coatings delivered to an applicator. [s. NR 422.15(2)(b), Wis. Adm. Code {Permit 08-RSG-053}] (3) Permittee may use (facility-	**(1)** The permittee shall uniquely identify and determine the VOC content of each coating applied, in units of pounds per gallon, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(2)** The permittee may use USEPA Method 24 results, Material Safety Data Sheets, or an equivalent document provided by the supplier for each coating, thinner and cleanup solvent, to demonstrate compliance with VOC content limits.	**(1) In compliance-** The facility maintains a spread sheet which contains coating names and VOC content of the coatings as applied in units of pounds per gallon excluding water. **(2) In compliance** – The facility maintains at site MSDS for all the coatings, solvent, and thinners which shows VOC content of coatings in pounds per gallon.

		wide aggregate)* up to 55 gallons of non-compliant coatings during any 12 consecutive month period. [s. NR 422.03(7), Wis. Adm. Code {Permit 08-RSG-053}] * Includes any non-compliant coatings used in processes P65 and P43A (4) All VOC emissions from solvent washings shall be considered in the emissions limitations in I.D.3.a.(1),(2) unless the used wash solvent is directed into containers that prevent evaporation into the atmosphere. [s. NR 422.15(8), Wis. Adm. Code {Permit 08-RSG-053}] Note: see condition I.ZZZ.1.a.(2), which limits VOC emissions from sources at Norwich Avenue site to 12,333 pounds per month, averaged over any 12 consecutive month period.	The documents shall contain sufficient information to calculate the VOC content in the units necessary to determine compliance. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(3)** If coatings as received are thinned prior to use, the permittee shall calculate the VOC content of the coating as delivered to each coating applicator as follows: VOCa = [(VOCc x Qc) + (VOCt x Qt)]/(Qc + Qt) where: VOCa = the VOC content of the coating as delivered to the coating applicator, in pounds per gallon excluding water; VOCc = the VOC content of the coating as received, in pounds per gallon, excluding water; Qc = the amount of coating as received that mixed with thinner prior to application, in gallons, excluding water; VOCt = the VOC content of the thinner as received, in pounds per gallon, excluding water; Qt = the amount of thinner added, in gallons, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(4)** *The permittee shall have available the following records on a daily basis for each coating formulation used:* *(a) A unique name or identification number of coating, as applied;* *(b) A unique name or identification and volume of clean-up solvent used, but not directed into a*	**(3) No evidence of noncompliance –** All coatings are used as purchased and are not thinned prior to use. **(4), and (5) – In compliance –** The facility maintains several spread sheets on a designated computer which lists name of coatings and solvents, daily gallon usage, VOC content of coatings and solvents in pounds/gallon, daily VOC emissions, monthly VOC emission, 12 month rolling average

			closed container (if any); (c) The VOC content of coating, as applied in units of pounds VOC per gallon, excluding water (clean-up solvents used that are not directed into a closed container shall be included in this computation). [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] **(5)** *The permittee shall keep the following monthly records: (a) The VOC content (in pounds per gallon) and quantity (in gallons) of each compliant coating and noncompliant coating applied during the month; (b) The quantity (in gallons) and VOC content (in pounds per gallon) of each cleanup solvent used during the month; (c) Amount of VOC emitted from processes P32, P32A, P32C, P35, and P36A combined, in pounds per month. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]* **(6)** *If non-compliant coatings are used at the facility, the permittee shall keep the following records on a monthly basis: (a) A unique name or identification number for each non-compliant coating applied; (b) The volume of each non-compliant coating applied during the month; (c) The aggregate volume of all non-compliant coatings applied during the month (including any non-compliant coatings used in processes P65*	emissions of VOC. Facility calculates on a daily, monthly and on a 12 month rolling average basis VOC emissions from processes P32, P32A, P32C, P35 and P36A. **(6) No evidence of noncompliance –** As per Mark Furgason of the facility and the records available for review during this inspection, the facility does not use any non complaint coatings. Coatings are water based and VOC content of all coatings ranges between 0.37 and 2.48 VOC pounds per gallon less water. The VOC content of the coatings are below permit limit of 3.5 lbs VOC per gallon of coating.

			and P43A); and *(d) The aggregate volume of all non-compliant coatings applied (including any non-compliant coatings used in processes P65 and P43A) during the last 12 consecutive month period. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]*	
	HAPs emissions	**(1)** The permittee shall meet all applicable requirements in section I.N (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. [Subchapter V of s. NR 465, Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] **Note:** Steel drum/Lid coating operations at the facility are part of the general use coating affected source that is subject to National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.	**(1)** The permittee shall comply with all applicable compliance demonstration requirements in section I.N (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. [Subchapter V of s. NR 465, Wis. Adm. Code, s. NR 407.09(4)(a)3.b., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	**(1) No evidence of noncompliance –** All coating are water based coatings. The facility is capable of emitting Triethylamine, methylene chloride, methanol, and toluene. **Note: Please see under HAPs emission on page 38 for detailed compliance demonstration.**
	NOx emissions	**(1)** Each of the curing ovens (processes P32B, P32D, and P36B) may not operate for more than 100 hours during any week. [s. NR 404.08(2),Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	**(1)** Permittee shall compile weekly records to demonstrate that each of the processes P32B, P32D, and P36B did not operate for more than 100 hours per week. [s.285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance –** The facility operates 8 hours per day and only 5 days per week. As per record maintained by the facility, operating hours of P32B, P32D, and P36B ranges between 0 hours/day and 8 hours/day. Therefore, each individual process has not been operated more than 40 hours per week.

Process P50A, Stack S50 — Caustic Drum Preflush. Process P50B, Stack S51 — Caustic Drum Wash. Table Process P50C, Stack S53 — Closed Drum Drying Oven. [these processes are located at Norwich Avenue site]	**Sodium Hydroxide emissions**	**(1)** The permittee may not cause, allow or permit emissions in such quantity or concentration or for such duration as to cause an ambient concentration of sodium hydroxide off the source property that exceeds 200 micrograms per cubic meter (per 1 hour). [s. NR 445.07(1)(a), Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** Permittee may not use caustic solutions that exceed 10% NaOH (by weight) in processes P50A and P50B. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(2)**(a) Process P50B (drum exterior washing) may not use spray techniques. (b) Permittee shall take measures to minimize any splashing in process P50B. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]. **(3)** *The permittee shall document and maintain a record of the percentage (or percentage range) of NaOH (by weight) in the caustic solutions used in processes P50A and P50B.* *[ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]*	**(1) In compliance –** As per Mark Furgason caustic solution contains 5-6% NaOH by weight. **(2)(a), and (b) In compliance –** Process P50B is a hot caustic soda tank which is used to clean close top drums. There is no spray nozzle at the tank. **(3) In compliance –** As per manufacturer invoice, if one gallon of 50% caustic is mixed with a minimum of 7 gallons of water, then NaOH percentage of the applied solution is 0% to 7.14%.
	Particulate matter emissions	**(1)** Particulate matter emissions may not exceed 0.01 pounds per hour from stack S53. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] **(2)** No person may cause, allow or permit particulate matter to be emitted into the ambient air which substantially contributes to exceeding of an air standard or creates air pollution. [s. NR 415.03, Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** Only natural gas shall be combusted in the drying oven (P50C). [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(2)**(a) Process P50B (drum exterior washing) may not use spray techniques. (b) Permittee shall take measures to minimize any splashing in process P50B. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]. **(3)** The permittee shall keep monthly records of	**(1) In compliance –** The facility uses only natural gas in process P50C. The facility buys its natural gas from Constellation New Energy, Chicago, Ill. **(2)(a), and (b) In compliance –** Process P50B is a hot caustic soda tank which is used to clean close top drums. There is no spray nozzle at the tank. **(3) In compliance –** The facility maintain monthly

			type(s) of fuel used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1.,Wis. Adm. Code {08-RSG-053}].	records of invoices from New Energy, Chicago, Ill.
	Visible emissions	**(1)** Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance –** This process was in operation. No VE was observed.
	NO_x emissions	**(1)** The process P50C may not operate for more than 100 hours during any week. [s. NR 404.08(2),Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	**(1)** Permittee shall compile weekly records to demonstrate that the process P50C did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(2)** *Permittee shall keep records required in condition I.E.4.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]*	**(1) In compliance –** The facility operates one 8 hour shift for 5 days per week. As per Mark Fergason, the facility runs wash operation for not more than 6 hours on any given day. As such the facility runs this process for not more than 30 hours per week. Daily **(2) In compliance –** the facility maintains daily hourly record for process P50C.
Process P60A, Stack S57 — New Drum/Lid Washer Hot Bath. Process P60B, Stack S58 — New Drum/Lid Dryer. [these processes are located at Norwich Avenue site]}	**Particulate matter emissions**	**(1)** Particulate matter emissions may not exceed the following: (a) 0.01 pounds per hour from stack S57. (b) 0.01 pounds per hour from stack S58. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** Only natural gas shall be combusted in the hot water heater (in P60A) or in the dryer (P60B). [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(2)** *The permittee shall keep monthly records of type(s) of fuel used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1.,Wis. Adm. Code {08-RSG-053}]*	**(1), and (2) In compliance –** The facility uses only natural gas in processes P60A, and P60B. The facility buys its natural gas from Constellation New Energy, Chicago, Ill. and maintains monthly invoices for payment purposes.
	Visible emissions	**(1)** Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(4)(a)3.b., Wis.	**(1) In compliance –** This process was in operation. However, no VE was observed.

			Adm. Code {Permit 08-RSG-053}]	
	NO_x emissions	**(1)** The processes P60A, P60B may not operate for more than 100 hours during any week. [s. NR 404.08(2),Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	**(1)** Permittee shall compile weekly records to demonstrate that each of the processes P60A, P60B did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance –** The facility operates one 8 hour shift for 5 days per week. As per Mark Fergason and records maintained, the facility runs wash and drying operation for not more than 6 hours on any given day. As such the facility runs this process for not more than 30 hours per week. Daily log for operating hours are maintained.
Process P65, Stack S65 — Drum Lid Clamp Dip Tank. [located at Norwich Avenue site]	**VOC emissions**	**(1)** The permittee may not cause, allow, or permit the emission of any VOCs in excess of 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator that applies air-dried coatings that are not clear coatings. [s. NR 422.15(3)(c), Wis. Adm. Code {Permit 08-RSG-053}] **(2)** Permittee may use (facility-wide aggregate)* up to 55 gallons of non-compliant coatings during any 12 consecutive month period. [s. NR 422.03(7), Wis. Adm. Code.] * Includes any non-compliant coatings used in processes P32, P32A, P32C, P35, P36A and P43A **(3)** All VOC emissions from solvent washings shall be considered in the emissions limitation in I.G.1.a.(1), unless the used wash solvent is directed into containers that prevent evaporation into the atmosphere. [s. NR 422.15(8), Wis. Adm. Code] **Note:** see condition I.ZZZ.1.a.(2), which limits VOC emissions from sources at Norwich Avenue site to 12,333 pounds per month, averaged over any 12 consecutive month period.	**(1)** The permittee shall uniquely identify and determine the VOC content of each coating applied, in units of pounds per gallon, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(2)** The permittee may use USEPA Method 24 results, Material Safety Data Sheets, or an equivalent document provided by the supplier for each coating, and thinner, to demonstrate compliance with VOC content limits. The documents shall contain sufficient information to calculate the VOC content in the units necessary to determine compliance. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] **(3)** If coatings as received are thinned prior to use, the permittee shall calculate the VOC content of the coating as delivered to the dip tank (coating applicator) as follows: VOCa = [(VOCc x Qc) + (VOCt x Qt)]/(Qc + Qt)	**(1) In compliance-** The facility maintains a spread sheet which contains coating names and VOC content of the coatings as applied in units of pounds per gallon excluding water. **(2) In compliance –** The facility maintains at site MSDS for all the coatings, solvent, and thinners which shows VOC content of coatings in pounds per gallon. **(3) No evidence of noncompliance –** All coatings are used as purchased and are not thinned prior to use.

			where: VOCa = the VOC content of the coating as delivered to the dip tank, in pounds per gallon excluding water; VOCc = the VOC content of the coating as received, in pounds per gallon, excluding water; Qc = the amount of coating as received that mixed with thinner prior to application, in gallons, excluding water; VOCt = the VOC content of the thinner as received, in pounds per gallon, excluding water; Qt = the amount of thinner added, in gallons, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] **(4)** *The permittee shall have available the following records on a daily basis for each coating formulation used:* *(a) A unique name or identification number of coating, as applied;* *(b) A unique name or identification and volume of clean-up solvent used, but not directed into a closed container (if any);* *© The VOC content of coating, as applied in units of pounds VOC per gallon, excluding water (clean-up solvents used that are not directed into a closed container shall be included in this computation).* *[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]* **(5)** *The permittee shall keep the following monthly records:* *(a) The VOC content (in*	**(4), and (5) – In compliance –** The facility maintain several spread sheets on a designated computer which lists name of coatings and solvents, daily gallon usage, VOC content of coatings and solvents in pounds/gallon, daily VOC emissions, monthly VOC emission, 12 month rolling average emissions of VOC. Facility calculate on a daily, monthly and on a 12 month rolling average VOC emissions from processes P32, P32A, P32C, P35 and P36A.

			pounds per gallon) and quantity (in gallons) of each compliant coating and noncompliant coating applied during the month; (b) The quantity (in gallons) and VOC content (in pounds per gallon) of each cleanup solvent used during the month; © Amount of VOC emitted in pounds per month. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] **(6)** *If non-compliant coatings are used at the facility, the permittee shall keep the following records on a monthly basis: (a) A unique name or identification number for each non-compliant coating applied; (b) The volume of each non-compliant coating applied during the month; © The aggregate volume of all non-compliant coatings applied during the month (including any non-compliant coatings used in processes P32, P32A, P32C, P35, P36A, and P43A and P43A) and (d) The aggregate volume of all non-compliant coatings applied (including any non-compliant coatings used in processes P32, P32A, P32C, P35, P36A, and P43A and P43A) during the last 12 consecutive month period. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]*	**(6) No evidence of noncompliance –** As per Mark Furgason of the facility, the facility does not use any non complaint coatings. Coatings are water based and VOC content of all coatings ranges between 0.37 and 2.48 VOC pounds per gallon less water.
	HAPs emissions	**(1)** The permittee shall meet	**(1)** The permittee shall	**(1) No evidence of**

		all applicable requirements in section I.N (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. [Subchapter V of s. NR 465, Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] **Note:** Drum lid clamp coating operations (P65) at the facility are part of the general use coating affected source that is subject to National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.	comply with all applicable compliance demonstration requirements in section I.N (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. [Subchapter V of s. NR 465, Wis. Adm. Code, s. NR 407.09(4)(a)3.b., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	**noncompliance** – All coatings are water based coatings. The facility is capable of emitting triethylamine, methylene chloride, methanol and toluene. **Note: Please see under HAPs emission on page 38 for detailed compliance demonstration.**
Process P44, Stack S44 — Label Stripping. [located at Pennsylvania Avenue site]	**VOC emissions**	**(1)** Latest Available Control Technology (LACT) applies to this process. LACT is determined to be: (a) VOC emissions not to exceed 1,666 pounds per month averaged over any 12 consecutive month period; and (b) Good operating practices.	**(1)** Good operating practices shall include all of the following: (a) Immediately after use, place all rags, or any other porous material used to apply solvent, in a covered container (labeled as waste solvent), and handled in accordance with local, state and federal regulations. (b) Store waste solvent only in covered containers labeled as waste solvent and handled in accordance with local, state and federal regulations. (c) Follow operating procedures which prevent solvent from dripping from the applicator during solvent application. [ss. NR 424.03(2)(c), and NR 407.09(4)(a)3.b., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] *(2) The permittee shall keep the following records:* *(a) MSDS or equivalent*	**(1) 9(a), and (b) - In compliance -** The facility uses two solvents (Chemisphere SP1700 and Zep Big Orange Degreaser) to strip the labels from plastic drums. Chemisphere is applied by brush and Zep Big Orange Degreaser is applied using rag. Used rags are kept in a red covered container and are shipped out as a hazardous material. **(c) No evidence of noncompliance** – These solvents are used in a very small quantity either using rags or using hand brush. Therefore, it is very unlikely that dripping may occur from the applicator. **(2), and (3) In compliance -** The facility maintain several spread sheets on a designated computer which lists name of coatings and solvents, daily gallon usage,

			document for each solvent used in this process. *(b) The VOC content of each solvent used.* *[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]* *(3) The permittee shall keep monthly records of:* *(a) the quantity of each solvent used;* *(b) amount of VOC emitted (in pounds);* *(c) amount of VOC emissions emitted (in pounds per month) averaged over the last 12 consecutive month period.* *[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]*	VOC content of coatings and solvents in pounds/gallon, daily VOC emissions, monthly VOC emission, 12 month rolling average emissions of VOC. Facility calculate on a daily, monthly, and on a 12 month rolling average basis VOC emissions from this process.
	HAPs emissions	**(1)** The permittee shall keep records to demonstrate that methylene chloride emissions from this process are exempt emissions under s. NR 445.07(5)(d)2., Wis. Adm. Code. [s. 285.65(3), Wis. Stats., ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	**Note:** Include records of applicable OSHA requirements, testing protocols, test results etc., to demonstrate that the source is in compliance with applicable occupational safety and health administration (OSHA) requirements	**(1) In compliance –** Four air samples were collected on January 12, 2009, at four fixed locations to detect methylene chloride concentration in the vicinity of the plastic drum label stripping operation. Each sample was collected for 510 minutes. Methylene chloride concentration was found to be 18.5 ppm, 15.6 ppm, 17.7 ppm, and 1.34 ppm. Methylene chloride has a threshold limit of 50 ppm, set as recommended value by American Conference of Governmental Industrial Hygienists (ACGIH). OSHA has set Permissible Exposure Level (PEL) 25 ppm and Short Term Exposure Level (STEL) of 125 ppm. Therefore, methylene chloride concentration in the vicinity of label stripping operations is well below the limit set by ACGIH and OSHA.
Process P80A, Control C21,	**Particulate matter emissions**	**(1)** Particulate matter emissions from stack S21 may	**(1)** Only natural gas shall be combusted in the	**(1) In compliance –** The facility only burns natural

Stack(s) S21, S60 — Caustic Preflush with Hot Caustic Heater. Process P80B, Control C21, Stack(s) S21, S61 — Exterior Wash/Soaker with Hot Caustic Heater. Process P80C, Control 21, Stack S21 — Exterior Rinse. Process P95, Control C21, Stack S21 – Small Plastic Drum Caustic Preflush [these processes are located at Pennsylvania Avenue site]		not exceed 0.47 pounds per hour. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] **(2)** Particulate matter emissions from each stack S60 and S61may not exceed 0.02 pounds per hour. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	heaters. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(2)**(a) Emissions (except natural gas combustion products) from P80A and P80B shall be controlled by a wet scrubber (C21). (b) Emissions from P80C and P95 shall be controlled by a wet scrubber (C21). [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(3)** The permittee shall maintain: (a) the pressure drop across the scrubber and demister within the pressure drop range (in inches of water column) recommended by the manufacturer or within a range approved by the Department; (b) the liquor flow rate through the scrubber at the flow rate (in gallons per minute) recommended by the manufacturer or at a rate approved by the Department. [ss. NR 439.055(1)(e), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] **(4)** The permittee shall perform periodic internal inspections of the wet scrubber to ensure that the control equipment is operating properly. The time interval between inspections may not exceed twelve (12) months. These inspections shall include, but not be limited to inspections and	gas in the heaters. **(2) (a), and (b)** **In compliance –** Emissions from processes P80A, P80B, P80C, and P95 is controlled by a wet scrubber (C21). **(3) (a), and (b)** **In compliance –** As per record maintained the pressure drop was recorded as 0.3 inches of water and water flow rate as 25 gpm. During the facility walk through a pressure drop of 0.4 inches of water and water flow rate of 20 gpm was observed. **(4) In compliance –** As per Mark Furgason of the facility, maintenance of the scrubber is performed every week or as and when needed by the facility maintenance staff. The last annual inspection and maintenance was done on July 27, 2010. Record of maintenance work done is maintained by the facility. The spray nozzle, inlet and outlet

			maintenance/repair (as necessary) of: (a) the spray nozzle(s) for signs of corrosion and plugging; (b) inlet and outlet ducts for plugging and leaks; (c) the pumping system, suction pipe, and pumping system valves; and (d) the mist eliminator for signs of corrosion and plugging. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(5)** *The permittee shall measure and record the following parameters once for every 8 hours of source operation or once per day, whichever yields the greater number of measurements:* *(a) the pressure drop across the scrubber and demister;* *(b) the liquor flow rate through the scrubber.* *[ss. NR 439.055(2)(b), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]* **(6)** *The permittee shall keep records of:* *(a) the date, time, and initials of the person performing the required periodic inspections;* *(b) a list of the items inspected; and* *(c) any maintenance or repairs performed as a result of these inspections.* *[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]* **(7)** *The permittee shall*	ducts, pumping system, and mist eliminator are visually inspected every day of operation. **(5) (a), and (b) In compliance –** The facility operates Monday to Friday 5 to 8 hours per day. Once for every 8 hours the pressure drop and flow rate is recorded by the operator. **(6) In compliance –** The signed maintenance and inspection sheet is maintained by the facility. This sheet lists the item inspected, and any repair performed. **(7) In compliance –** The facility maintains monthly invoice from Constellation New Energy, Chicago, Ill

			keep monthly records of type(s) of fuel used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1.,Wis. Adm. Code {08-RSG-053}]	for natural gas usage.
	Visible emissions	**(1)** Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance –** This process was in operation. No VE was seen.
	Sodium hydroxide emissions	**(1)** The permittee may not cause, allow or permit emissions in such quantity or concentration or for such duration as to cause an ambient concentration of sodium hydroxide off the source property that exceeds 200 micrograms per cubic meter (per 1 hour). **[s. NR 445.07(1)(a), Wis. Adm. Code {Permit 08-RSG-053}]**	**(1)** The compliance demonstration requirements for particulate matter emissions in conditions I.I.1.b.(2) through (4) shall also serve as a compliance demonstration method for sodium hydroxide emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance –** Please see compliance demonstration under particulate matter emission for this process.
	NO_x emissions	**(1)** Each of the processes P80A, P80B may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	**(1)** Permittee shall compile weekly records to demonstrate that each of the processes P80A, P80B did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance –** The facility operates these processes 5 to 8 hours on any given day. These processes are operated only Monday to Friday. Therefore, the operating hours could not exceed 40 hours per week.
Process P42A, Stack S64 — Hot Water Heater. Process P42B, Stack S63 — Hot Water Heater Process P42C, Stack S62 — Hot Water Heater. Process P41, Stack S66 — Drying Oven/Flamer. [these processes	**Particulate matter emissions**	**(1)** Particulate matter emissions may not exceed: (a) 0.02 pounds per hour from S64; (b) 0.02 ponds per hour from S63; (c) 0.02 ponds per hour from S62; and (d) 0.01 ponds per hour from S66; [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** Only natural gas shall be combusted in the heaters and in the oven. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance –** The facility only burns natural gas in the heaters.

are located at Pennsylvania Avenue site]}				
	Visible emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. **[s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]**	**(1) In compliance –** Please compliance demonstration for particulate matter for this process above.
	NO_x	**(1)** Each of the processes P42A, P42B, P42C, P41 may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	**(1)** Permittee shall compile weekly records to demonstrate that each of the processes P42A, P42B, P42C, P41 did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance –** The facility operates these processes 5 to 8 hours on any given day. These processes are operated only Monday to Friday. Therefore, the operating hours could not exceed 40 hours per week.
Process P43A, Control Device C22 (Fabric Filter), Stack S22 — Auto Drum and Lid Spray Booth. Process P43B, Stack S70 — Drying Oven. [these processes are located at Pennsylvania Avenue site]	**Particulate matter emissions**	**(1)** Particulate matter emissions may not exceed 0.22 pounds per hour from stack S22. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] **(2)** Particulate matter missions may not exceed 0.02 pounds per hour from stack S70. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] **(3)** No person may cause, allow or permit particulate matter to be emitted into the ambient air which substantially contributes to exceeding of an air standard, or creates air pollution. [s. NR 415.03, Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** Dry filter(s) shall be in place to control particulate matter emissions whenever the process P43A is in operation (i.e. during spray operation). [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(2)** Only natural gas shall be combusted in the drying oven (P43B). [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(3)** The permittee shall install, operate, and maintain a device to monitor the pressure drop across each filter. [ss. NR 439.055(1)(a), and NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) No evidence of noncompliance –** As per Mark Furgason of the facility this booth is seldom used as facility at Pennsylvania Avenue cleans only plastic drums and totes using hot water and NaOH solution. In December 2010, this process was used only for 2 hours and filters were in place. **(2) In compliance –** The facility only use natural gas as a fuel for P43B. **(3), (4)(a), (4)(b), and (4)(c) - In compliance –** Pressure drop gauges are installed to monitor the pressure drop across the filter. Manufacturer recommended pressure drop value for the filter ranges between 0.035 to 0.5 inches of water. The

			(4)(a) The pressure drop across filter(s) in operation shall be maintained within the range recommended by the manufacturer. (b) The permittee shall keep records (e.g. manufacturer's specifications) that indicate the manufacturer recommended pressure drop range for type of filter used in the paint booth. (c) The operating filter pressure drop range shall be included in the facility's malfunction prevention and abatement plan. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	same has been incorporated in the facility's malfunction prevention and abatement plan. The plan was last updated on December 29, 2010. The facility records pressure drop across the filters every 8 hours of operation. Whenever this process is in operation the pressure drop across the filters ranges between 0.04 inches of water and 0.06 inches of water.
			(5) The permittee shall perform daily inspections of the filter (on days of operation) to ensure that the control equipment is operating properly.[s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	**(5) In compliance-** At the beginning of the shift the paper filters are visually inspected before the start of the shift and the filters are replaced whenever this process is in operation before the start of painting operation.
			(6) *The permittee shall monitor and record the pressure drop across the filter(s) every 8 hours when the associated process is in operation. [ss. NR 439.055(2)(b)1., and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]*	**(6) In compliance –** Whenever this process is in operation the facility records pressure drop across the filters every 8 hours of operation. The pressure drop across the filters ranges between 0.04 inches of water and 0.06 inches of water. Records were available for review.
			(7) *The permittee shall keep daily records of filter inspections. The permittee shall also keep records of filter replacements including date(s) of replacement. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-*	**(7) No evidence of noncompliance-** Filters are replaced whenever painting is in operation. However, no records of inspection or replacement of filters are maintained at site.

			RSG-053}]	
	Visible emissions	**(1)** Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** Whenever visible emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 9 or another test method approved by the Department in writing. [ss. NR 407.09(1)(c)1.a. and NR 439.06(9)(a)1., Wis. Adm. Code {Permit 08-RSG-053}] **(2)** The recordkeeping and monitoring requirements for particulate matter will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a), Wis. Adm. Code]	**(1) No evidence of noncompliance –** This process was not in operation during this inspection and the Department has not asked the facility to conduct U.S. EPA method 9 testing. **(2) In compliance –** Please see compliance demonstration under particulate matter emission above for this process.
	VOC emissions	**(1)** The permittee may not cause, allow, or permit the emission of any VOCs in excess of 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator that applies air-dried coatings that are not clear coatings. [s. NR 422.15(3)(c), Wis. Adm. Code {Permit 08-RSG-053}] **(2)** Emissions may not exceed 3.5 pounds VOC per gallon of coating applied, excluding water, for extreme performance cured coatings delivered to an applicator. [s. NR 422.15(2)(b), Wis. Adm. Code {Permit 08-RSG-053}] **(3)** Permittee may use (facility-wide aggregate)* up to 55 gallons of non-compliant coatings during any 12 consecutive month period. [s. NR 422.03(7), Wis. Adm. Code.] * Includes any non-compliant coatings used in processes P32, P32A, P32C, P35, P36A and P65. **(4)** All VOC emissions from	**(1)** The permittee shall uniquely identify and determine the VOC content of each coating applied, in units of pounds per gallon, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(2)** The permittee may use USEPA Method 24 results, Material Safety Data Sheets, or an equivalent document provided by the supplier for each coating, ink, thinner and cleanup solvent, to demonstrate compliance with VOC content limits. The documents shall contain sufficient information to calculate the VOC content in the units necessary to determine compliance. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code {Permit 08-RSG-053}] **(3)** If coatings as received	**(1) In compliance-** The facility maintains a spread sheet which contains coating names and VOC content of the coatings as applied in units of pounds per gallon excluding water. **(2) In compliance –** The facility maintains at site MSDS for all the coatings, solvent, and thinners which shows VOC content of coatings in pounds per gallon. **(3) No evidence of noncompliance –** All

		solvent washings shall be considered in the emissions limitations in I.K.1.a.(1),(2), unless the used wash solvent is directed into containers that prevent evaporation into the atmosphere. [s. NR 422.15(8), Wis. Adm. Code]	are thinned prior to use, the permittee shall calculate the VOC content of the coating as delivered to each coating applicator as follows: VOCa = [(VOCc x Qc) + (VOCt x Qt)]/(Qc + Qt) where: VOCa = the VOC content of the coating as delivered to the coating applicator, in pounds per gallon excluding water; VOCc = the VOC content of the coating as received, in pounds per gallon, excluding water; Qc = the amount of coating as received that mixed with thinner prior to application, in gallons, excluding water; VOCt = the VOC content of the thinner as received, in pounds per gallon, excluding water; Qt = the amount of thinner added, in gallons, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(4)** *The permitee shall uniquely identify and determine the VOC content of each coating applied, in unites, in units of pounds per gallon, excluding water.(s. NR 407.09(4)(a)3.b, Wis. Adm. Code)* **(5)** *The permittee shall have available the following records on a daily basis for each coating formulation used:* *(a) A unique name or identification number of coating, as applied;* *(b) A unique name or identification and volume*	coatings are used as purchased and are not thinned prior to use. **(4), (5) and (6) – In compliance –** The facility maintains several spread sheets on a designated computer which lists name of coatings and solvents, daily gallon usage, VOC content of coatings and solvents in pounds/gallon, daily VOC emissions, monthly VOC emission, 12 month rolling average emissions of VOC. Facility calculates on a daily, monthly and on a 12 month rolling average basis VOC emissions from processes P32, P32A, P32C, P35 and P36A.

			of clean-up solvent used, but not directed into a closed container (if any); *© The VOC content of coating, as applied in units of pounds VOC per gallon, excluding water (clean-up solvents used that are not directed into a closed container shall be included in this computation).* *[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]* **(6)** *The permittee shall keep the following monthly records:* *(a) The VOC content (in pounds per gallon) and quantity (in gallons) of each compliant coating and noncompliant coating applied during the month;* *(b) The quantity (in gallons) and VOC content (in pounds per gallon) of each cleanup solvent used during the month;* *© Amount of VOC emitted processes P32, P32A, P32C, P35, and P36A in pounds per month.* *[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]* **(7)** *If non-compliant coatings are used at the facility, the permittee shall keep the following records on a monthly basis:* *(a) A unique name or identification number for each non-compliant coating applied;* *(b) The volume of each non-compliant coating applied during the month;* *© The aggregate volume of all non-compliant*	**(7) No evidence of noncompliance –** As per Mark Furgason of the facility, the facility does not use any non complaint coatings. Coatings are water based and VOC content of all coatings ranges between 0.37 and 2.48 VOC pounds per gallon less water.

			coatings applied during the month (including any non-compliant coatings used in processes P32, P32A, P32C, P35,and P36A), and *(d) The aggregate volume of all non-compliant coatings applied (including any non-compliant coatings used in processes P32, P32A, P32C, P35, P36A, and P65) during the last 12 consecutive month period. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]*	
	HAPs emissions	**(1)** The permittee shall meet all applicable requirements in section I.N (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. [Subchapter V of s. NR 465, Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] **Note:** Steel drum/Lid coating operations at the facility are part of the general use coating affected source that is subject to National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.	**(1)** The permittee shall comply with all applicable compliance demonstration requirements in section I.N (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. [Subchapter V of s. NR 465, Wis. Adm. Code, s. NR 407.09(4)(a)3.b., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	**(1) No evidence of noncompliance –** All coatings are water based coatings. The facility is capable of emitting triethylamine, methylene chloride, methanol and toluene. **Note: Please see under HAPs emission on page 38 for detailed compliance demonstration.**
	NO_x emissions	**(1)** The process P43B may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}] **(2)** Exhaust stack S70 shall have unobstructed airflow. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	**(1)** Permittee shall compile weekly records to demonstrate that the process P43B did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(2)** Permittee shall ensure the exhaust stack for the spray booth (Stack S70) is not equipped with a	**(1) No evidence of noncompliance –** Facility operates Monday to Friday, 5 to 8 hours on any given day. As such this process could operate a maximum of 40 hours per week. **(2) In compliance –** The stack S70 has no rain hat.

			rainhat or other device that impedes the upward flow of exhaust gases. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	
Process P90, Control Device C21 (Wet Scrubber), Stack S21 — Tote Caustic Wash. Process P90A, Stack S67 — Hot Caustic Heater. Process P90B, Stack S68 — Hot Caustic Heater. Process P90C, Stack S69 — Hot Water Heater. [these processes are located at Pennsylvania Avenue site]	**Particulate matter emissions**	**(1)** Particulate matter emissions may not exceed 0.47 pounds per hour from stack S21. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] **(2)** Particulate matter emissions may not exceed: (a) 0.02 pounds per hour from S67; (b) 0.02 ponds per hour from S68; and (c) 0.02 ponds per hour from S69 [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** Only natural gas shall be combusted in the heaters. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(2)** Emissions from P90 shall be controlled by a wet scrubber (C21). [s. 285.65(7), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(3)** The permittee shall maintain: (a) the pressure drop across the scrubber and demister within the pressure drop range (in inches of water column) recommended by the manufacturer or within a range approved by the Department; (b) the liquor flow rate through the scrubber at the flow rate (in gallons per minute) recommended by the manufacturer or at a rate approved by the Department. [ss. NR 439.055(1)(e), and NR 407.09(4)(a)3.b., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] **(4)** The permittee shall perform periodic internal inspections of the wet scrubber to ensure that the control equipment is operating properly. The time interval between inspections may not exceed twelve (12) months. These inspections shall include,	**(1) In compliance –** The facility only burns natural gas in the heaters. **(2) (a), and (b) In compliance –** Emissions from processes P80A, P80B, P80C, and P95 is controlled by a wet scrubber (C21). **(3) (a), and (b) In compliance –** As per record maintained the pressure drop was recorded as 0.3 inches of water and water flow rate as 25 gpm. During the facility walk through a pressure drop of 0.4 inches of water and water flow rate of 20 gpm was observed. **(4) In compliance –** As per Mark Furgason of the facility, maintenance of the scrubber is performed every week or as and when needed by the facility maintenance staff. The last annual inspection and maintenance was done on July 27, 2010. Record of maintenance work done is maintained by

			but not be limited to inspections and maintenance/repair (as necessary) of: (a) the spray nozzle(s) for signs of corrosion and plugging; (b) inlet and outlet ducts for plugging and leaks; (c) the pumping system, suction pipe, and pumping system valves; and (d) the mist eliminator for signs of corrosion and plugging. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	the facility. The spray nozzle, inlet and outlet ducts, pumping system, and mist eliminator are visually inspected every day of operation.
			(5) *The permittee shall measure and record the following parameters once for every 8 hours of source operation or once per day, whichever yields the greater number of measurements:* *(a) the pressure drop across the scrubber and demister;* *(b) the liquor flow rate through the scrubber.* *[ss. NR 439.055(2)(b), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]*	**(5) (a), and (b) In compliance –** The facility operates Monday to Friday 5 to 8 hours per day. Once for every 8 hours the pressure drop and flow rate is recorded by the operator.
			(6) *The permittee shall keep records of:* *(a) the date, time, and initials of the person performing the required periodic inspections;* *(b) a list of the items inspected; and* *© any maintenance or repairs performed as a result of these inspections.* *[ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis.*	**(6) In compliance –** The signed maintenance and inspection sheet is maintained by the facility.

			Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	
	Visible emissions	**(1)** Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance –** This process was in operation during this visit. No VE was observed.
	Sodium hydroxide emissions	**(1)** The permittee may not cause, allow or permit emissions in such quantity or concentration or for such duration as to cause an ambient concentration of sodium hydroxide off the source property that exceeds 200 micrograms per cubic meter (per 1 hour). [s. NR 445.07(1)(a), Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for sodium hydroxide emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance –** Please see compliance demonstration for particulate matter emission from this process above.
	NO_x emissions	**(1)** Each of the processes P90A, P90B, P90C may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}] **(2)** Exhaust stacks S67, S68 and S69 shall have unobstructed air flows. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}	**(1)** Permittee shall compile weekly records to demonstrate that each of the processes P90A, P90B, P90C did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] **(2)** Permittee shall ensure the exhaust stacks for the heaters (stacks S67, S68 and S69) are not equipped with rainhats or other devices that impedes the upward flow of exhaust gases. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance –** As per records maintained by the facility this process is operated no more that 8 hours per day from Monday to Friday. Therefore, this process can be run maximum of 40 hours per week.
Process P45, Stack S45 — Plastic Drum Cleaning. [located at	**VOC emissions**	(1) Latest Available Control Technology (LACT) applies to this process. LACT is determined to be: (a) VOC emissions not to	(1) Good operating practices shall include all of the following: (a) Immediately after use, place all rags, or any	**(1) In compliance –** The facility either use hand brush or rags to apply solvent. After use the rags are store in a red color cover

Pennsylvania Avenue site]		exceed 1,666 pounds per month averaged over any 12 consecutive month period; and (b) good operating practices. [s. NR 424.03(2)©, Wis. Adm. Code{Permit 08-RSG-053}] (2) See condition I.ZZZ.1.a.(1)	other porous material used to apply VOC containing solvent, in a covered container (labeled as waste solvent), and handled in accordance with local, state and federal regulations. (b) Store waste VOC-containing solvent only in covered containers labeled as waste solvent and handled in accordance with local, state and federal regulations. © Follow operating procedures which prevent VOC-containing solvent from dripping from the applicator during solvent application. [ss. NR 424.03(2)©, and NR 407.09(4)(a)3.b., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	container and are shipped out as hazardous material. **(2) In compliance –** VOC emissions from P44 and P45 has not exceeded 365 pound per month on a 12-month rolling average basis.
	National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products [Chapter NR 465, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]_	**(1)** For the general use coating affected source, limit organic HAP emissions to no more than 0.31 kg of organic HAP per liter (2.6 lb/gallon) of coating solids used during each 12−month compliance period. [s. NR 465.43(1)(b)1., Wis. Adm. Code {Permit 08-RSG-053}]	**(1)** Compliant material option. You shall meet all the requirements of s. NR 465.46 to demonstrate compliance with the emission limit in Condition I.N.1.a.(1) using this option. To use this option, you shall demonstrate that the organic HAP content of each coating used in the coating operation or operations is less than or equal to the emission limit in Condition I.N.1.a.(1), and that each thinner and other additive, and cleaning material used contains no organic HAP. [s. NR 465.43(2)(a), Wis. Adm. Code {Permit 08-RSG-053}]	**(1) In compliance -** Triethylamine is the only Federal and State HAP found in the coating. As per record submitted the facility coatings contain 0.04 lb triethylamine HAP per gallon of coating solids to 0.1 lb triethylamine per pound of solids. As the coatings contain less than 2.6 lbs of HAP per gallon of solids, the coatings are NESHAP complaint coatings. In addition to above the facility uses Chemisphere SP 1700, which is a semi paste chlorinated stripper. This stripper contains 77-85% methylene chloride by weight. Methylene chloride is not a VOC but is Federal and State HAP. Emission of methylene chloride is fugitive. During the

				calendar year 2010, the facility has emitted 6.05 tons of methylenne chloride, 2.61 tons of triethylamine, 0.43 tons of toluene, and 0.85 ton of methanol..
	Conditions Applicable to the Entire Facility. – Synthetic Minor Conditions	**(1)** VOC emissions from the Pennsylvania Avenue site (excluding VOC emissions from combustion of natural gas) may not exceed 4,000 pounds per month, averaged over any 12 consecutive month period. [s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}] Note: Permittee elected this condition to avoid non-attainment area major source review under the ozone 1-hr standard, for the construction (1995 construction) of sources at the Pennsylvania Avenue Site. Maximum theoretical VOC emissions from combustion of natural gas for sources constructed at the Pennsylvania Avenue site in 1995 are less than 1 tpy. **(2)** VOC emissions from the Norwich Avenue site (excluding VOC emissions from combustion of natural gas) may not exceed 12,333 pounds per month, averaged over any 12 consecutive month period. [s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}] **(3)** VOC emissions from combustion of natural gas at the facility may not exceed 250 pounds per month, averaged over any 12 consecutive month period. [s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}] Note: Elected conditions (1), (2) and (3) ensure VOC emissions from the facility are less than 100 tpy. Therefore, the facility will remain a synthetic minor moderate non-attainment area minor source under the ozone 8-hr standard.	**(1)** Within 15 days of end of each calendar month, the permittee shall compute and record the following: (a) Total amount of VOC emitted (in pounds) from processes (other than from combustion of natural gas) located at Pennsylvania Avenue Site; (b) Total amount of VOC emitted (in pounds) from processes (other than from combustion of natural gas) located at Norwich Avenue Site; (c) Total amount of VOC emitted (in pounds) from combustion of natural gas at the facility; (d) Amount of VOC emitted (in pounds per month) from processes (other than from combustion of natural gas) located at Pennsylvania Avenue Site, averaged over the last 12 consecutive month period. (e) Amount of VOC emitted (in pounds per month) from processes (other than from combustion of natural gas) located at Norwich Avenue Site, averaged over the last 12 consecutive month period. (f) Amount of VOC emitted (in pounds per month) from combustion of natural gas at the facility, averaged over the last 12 consecutive month period.	**(1)(a) In compliance –** During the calendar year 2010, VOC emissions Pennsylvania plant (processes other than combustion of natural gas) never exceeded than 365 lbs VOC per month. **(1)(b) In compliance –** During the calendar year 2010, total amount of VOC emitted from Norwich plant (processes other than combustion of natural gas) never exceeded 3013 lbs VOC per month. **1(c) In compliance -** During the calendar year 2010, total amount of VOC emitted from Norwich plant and Pennsylvania plant from combustion of natural gas never exceeded 29 lbs VOC per month. **1(d) In compliance -** During the calendar year 2010, total amount of VOC emitted from Pennsylvania plant (from processes other than combustion of natural gas) never exceeded 257 lbs VOC per month based on 12 month rolling average. **1(e) In compliance -** During the calendar year 2010, total amount of VOC emitted from Norwich plant (from processes other than combustion of natural gas) never exceeded 2678 lbs VOC per month based on 12 month rolling average. **1(f) In compliance -** During the calendar year 2010, total

			[s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] Note: VOC emission sources at the facility include natural gas combustion units (e.g. boiler, reclamation furnace, curing/drying ovens, caustic/water heaters), paint booths, Drum lid clamp dip tank (P65), plastic drum label stripping (P44), Plastic drum cleaning (P45 – when VOC containing	amount of VOC emitted from Norwich plant and Pennsylvania plant from the combustion of natural gas never exceeded 23 lbs VOC per month based on 12 month rolling average.
	Conditions Applicable to the Entire Facility. – HAPs emissions.	**(1)** No owner or operator of a source may cause, allow or permit emissions of a hazardous air contaminant listed in Table A of s. NR 445.07, Wis. Adm. Code, in such quantity or concentration or for such duration as to cause an ambient air concentration of the contaminant off the source property that exceeds the concentration in column (g) of Table A for the contaminant. [s. NR 445.07(1)(a), Wis. Adm. Code {Permit 08-RSG-053}]* **(2)** Methylene chloride (indoor fugitive) emissions from process P44: In order to demonstrate that methylene chloride (indoor fugitive) emissions are exempt from NR 445 review, permittee shall demonstrate to the Department that the source is in compliance with applicable occupational safety and health administration requirements. [s. NR 445.07(5)(d)2., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	**(1)** The permittee shall only burn Group 1 virgin fossil fuels (Natural gas, propane, distillate #2 and diesel fuel oil) when firing any fuel combustion sources. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]* **(2)** When the permittee elects to significantly change the existing operation (e.g., raw material or product change or production capacity increase), the permittee shall determine, either analytically or through the use of technical calculations, the facility's new or increased potential emissions of any state hazardous air pollutant (State HAP) emitted, assuming maximum operation conditions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]* **(3)** The permittee shall determine if the facility's new or increased potential emission rate of any State HAP exceeds the applicable published deminimus value in Table A of s. NR 445.07, Wis. Adm. Code. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]*	**(1) In compliance –** The facility only burns natural gas as a fuel for combustion processes at both plants. **(2) No evidence of noncompliance.** **(3) No evidence of noncompliance.**

			(4) When the facility's new or increased potential emission rate of any State HAP exceeds a published de minimus value, the permittee shall evaluate the impact of the pollutant's emission and determine if any additional action needs to be taken to protect the ambient air quality standard. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]* (5) See conditions in sections I.E.1, I.I.3, and I.L.3 for applicable requirements for NaOH emissions.	**(4) No evidence of non compliance.** **Permit Limitations:** **(1)No evidence of noncompliance.** **(2) In compliance -** Four air samples were collected on January 12, 2009, at four fixed locations to detect methylene chloride concentration in the vicinity of the plastic drum label stripping operation. Each sample was collected for 510 minutes. Methylene chloride concentration was found to be 18.5 ppm, 15.6 ppm, 17.7 ppm, and 1.34 ppm. Methylene chloride has a threshold limit of 50 ppm, set as recommended value by American Conference of Governmental Industrial Hygienists (ACGIH). OSHA has set Permissible Exposure Level (PEL) 25 ppm and Short Term Exposure Level (STEL) of 125 ppm. Therefore, methylene chloride concentration in the vicinity of label stripping operations is well below the limit set by ACGIH and OSHA.
	Malfunction Prevention and Abatement Plan.	**(1)** A malfunction prevention and abatement plan shall be prepared and followed for the plant. [s. NR 439.11, Wis. Adm. Code] **(2)** All air pollution control equipment shall be operated and maintained in conformance with good engineering practices (i.e. operated and maintained according to manufacturer's specifications and directions) to minimize the possibility for the exceedance of any emission limitations.	**(1)** The malfunction prevention and abatement plan shall be developed to prevent, detect and correct malfunctions or equipment failures which may cause any applicable emissions limitation to be violated or which may cause air pollution. [s. NR 439.11(1), Wis. Adm. Code] **(2)** This malfunction prevention and abatement plan shall include installation, maintenance and routine calibration	**(1) and (2) In compliance –** The facility has developed a Malfunction Prevention and Abatement Plan (MPAP) plan. This plan was revised on December 29, 2010, and was submitted to the Department on February 15, 2011.

		[s. NR 439.11(4), Wis. Adm. Code] **(3)** The facility shall submit the plan to the Wisconsin Department of Natural Resources Southeast Region Headquarters for review. The department may amend the plan if deemed necessary for malfunction prevention or for the reduction of excess emissions during malfunctions. [s. NR 439.11(2), Wis. Adm. Code]	procedures for the process monitoring and control equipment instrumentation. This plan shall require an instrumentation calibration at the frequency specified by the manufacturer, yearly or at a frequency based on good engineering practice as established by operational history, whichever is more frequent. Inspection and calibration shall also be conducted whenever instrumentation anomalies are noted. [ss. NR 407.09(1)(c)1.c., NR 439.055(4) and s. NR 439.11, Wis. Adm. Code] **(3)** The malfunction prevention and abatement plan shall require a copy of the operation and maintenance manual for the control equipment to be maintained on site. The plan shall contain all of the elements in s. NR 439.11(1)(a) – (h), Wis. Adm. Code. [s. NR 439.11, Wis. Adm. Code]	

FACILITY REPORTING REQUIREMENTS:

REQUIREMENT	FREQUENCY AND/OR DUE DATE	COMPLIANCE STATUS
Semi annual monitoring report	July 15th and February 14th	In compliance
Annual compliance certification	February 15th	In compliance

RESULTS OF PREVIOUS FCE REPORTS/SITE VISITS:

FCE REPORT DATE	RESULT	COMMENTS
September 22, 2008	Non Compliance	Failure to perform inline averaging

RESULTS OF PREVIOUS EMISSION TESTS:

SOURCE	TEST DATE	POLLUTANT(S)	EMISSION LIMIT	RESULT	COMMENTS
P30	January/2005	PM	5.0 lbs/hr	4.01 lbs/hr	In compliance

SUMMARY OF PREVIOUS COMPLAINTS:

COMPLAINT DATE	COMPLAINT DESCRIPTION	FOLLOW-UP ACTION	COMMENTS
April 15, 2005	Odor	Site visit on April 19, 2005	A solvent smell was detected, but it was not found to be objectionable.
April 19, 2005	Odor	Site visit on April 21, 2005	No objectionable odor was detected
August 25, 2008	Odor	Site visit on August 25, 2008, and met with the complainant.	No objectionable odor was detected. At the time of my investigation, Kitzinger had already closed for the day.
January 14, 2011	Odor	Email enquiry from Mark Furgason	Reply from Mark – I had the guys go up on the roof and smell the exhaust from the scrubber they found no foul smell coming from it I instructed them asap possible to get inside of the scrubber and do a complete clean out of it. We do drain the water daily and refill it but maybe there is some residue in their with a detergent smell. So we are planning to get that accomplished this weekend
February 8, 2011	Smoke	Site visit on February 8, 2011	Afterburner shut down due to some electrical issue. Process was shutdown and electrical problem was solved.
February 22, 2011	Odor	Site visit on February 22. 2011	No objectionable odor detected

SUMMARY OF PREVIOUS ENFORCEMENT ACTIONS:

ACTION DATE	ACTION TYPE	NR CODE CITED	RESOLVED [Y/N]	COMMENTS
December 7, 2007	Notice of Violation (NOV)	s. NR 423.03 (metal cleaning), s. NR 423.035 (industrial cleaning), or s. NR 424.03 (process line) ss. NR 406.03 and NR 406.04(2) (construction permit)	Y Y	The facility discontinued the use of RC Lacquer Solvent. Only acetone (non-VOC) is used. The facility is in the process of file a construction permit for the Pennsylvania

		s. 285.60, Wis. Stats (operation permit compliance)	Y	Avenue Site. The facility has improved its recordkeeping procedures and is submitting its required reports in a timely manner.

INSPECTION FIELD NOTES AND DISCUSSION

1. At the time of this inspection it was sunny, wind was from NE 10-15 mph, and temperature was approximately 40°F. Both facilities were observed from Norwich Ave. No VE emission was noted.

2. The inspection started with the review of records maintained by the facility. Present during the review were Mark Furgason, President of the company and Amy Litscher, President of Saga Environmental & Engineering, Inc. After review of the records, a walk through of the facility was conducted along with Mark Furgason. During the exit meeting certain details were requested. To which Amy said that she will send them to me electronically.

3. The facility maintains all the pertinent records on a designated computer in excel spread sheet. These records include daily paint usages at individual paint booth, VOC content of each paint used, daily VOC emissions from each paint booth, monthly VOC emissions from each paint booth, monthly Norwich plant VOC emission, monthly Pennsylvania plant VOC emission, total combined VOC emission, and VOC emission based on 12-month rolling average for individual plant as well as both plant combined.

4. In addition to above the facility has capability of emitting triethylamine, methylene chloride, toluene, and methanol HAPs. The facility maintains daily and monthly HAPs emission records in pounds for individual paint booths and label stripping area. However, actual emission of methanol, and toluene are below reporting level for air emission inventory.

5. Facility maintains hand written daily pressure drop records for paint booths, and baghouses. Hand written scrubber liquid flow is also maintained on daily basis.

6. Paint line and spray guns are cleaned using non-VOC acetone. Acetone is also used for wipe cleaning the plastic barrels at Pennsylvania plant.

7. Coatings used at Norwich plant are all water based and contains 0.37 to 2.42 lbs of VOC per gallon of coating less water. HAPs content in coatings ranges from 0.04 to 0.05 lbs HAPs per gallon of solids.

8. Caustic solution used at the facility contains NaOH upto 7.15% by weight.

9. Afterburner temperature is recorded on a continuous basis on a strip chart. At the time of this inspection the temperature of afterburner was 1840°F.

MAJOR SOURCE ANALYSIS

The facility was issued its original Title V operation permit 241063570-P01on December 21, 2004. The facility is a major, Part-70 source. On June 1, 2006, the facility was issued a construction permit 085-DJH-423 to rebuild the equipment damaged by the fire in 2005. The construction permit covers many, but not all, of the air emission sources addressed by the facility's existing operation permit. The construction permit did not supersede any parts of the facility's existing operation permit, but reduces the facility's potential emissions for VOC from 249 tpy to 99 tpy. Because of the need to remove and/or modify several permit conditions in 05-DJH-423 pertaining to sources at Norwich Plant, a construction permit 08-RSG-053 was issued on November 30, 2010. This construction permit was also processed as renewal of operation permit 241063570 – P10.The facility remains a major Part 70 source because the facility remains a major emission source for Federal HAP (methylene chloride). The facility is an existing affected source

under the MACT standard for Surface Coating Miscellaneous Metal Parts (Subpart MMMM). The following table shows PTE emissions of VOC and HAPs from PD dated September 2, 2010 and actual emissions from 2009 AEI.

Pollutants	PTE from PD (tons/year)	Actual emissions (tons/year)	Major source threshold (tons/year)
VOC	99.50	15.57	100.0
Methylene chloride	112.90	5.09	10/25
Triethylamine	33.80	2.60	10/25
Methanol	15.9	BRL	10/25
NaOH	<1	BRL	10/25

From the above table it is noted that the facility will remain as a Part 70 major source for Hazardous air pollutants and a SM80 source for VOC.

RECOMMENDATIONS/CONCLUSIONS

The facility has done a great job in keeping and maintaining all records as required by the permit. The facility is in compliance with all the permit conditions.

SAFETY EQUIPMENT REQUIRED TO GAIN ACCESS TO SITE:

- ■ **HEARING PROTECTION**
- ■ **HARD HAT**
- ■ **SAFETY GLASSES**
- ■ **BOOTS**
- ☐ **OTHER (please list)**